

Patrick R. Kitchen, Esq. (SBN. 162965)
THE LAW OFFICE OF PATRICK R. KITCHIN
565 Commercial Street, 4th Floor
San Francisco, CA 94111
415-677-9058
415-627-9076 (fax)

Attorneys for Plaintiffs
Janis Keefe, Corinne Phipps and Renee Davis

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA

ANN OTSUKA, an individual; JANIS KEEFE, an individual; CORINNE PHIPPS, an individual; and RENEE DAVIS, an individual; individually and on behalf of all others similarly situated,) Case No.: C-07-02780-SI
)
) DECLARATION OF NANCY E. HUDGINS IN SUPPORT OF
) PLAINTIFFS' MOTION FOR CLASS
) CERTIFICATION
)
Plaintiffs,)
vs.) Date: July 11, 2008
) Time: 9:00 a.m.
POLO RALPH LAUREN CORPORATION; a Delaware Corporation; POLO RETAIL, LLC., a Delaware Corporation; POLO RALPH LAUREN CORPORATION, a Delaware Corporation, doing business in California as POLO RETAIL CORP; and FASHIONS OUTLET OF AMERICA, INC., a Delaware Corporation) Courtroom: 10 (19th Floor)
) Judge: Hon. Susan Illston
)
)
Defendants.)

I, Nancy E. Hudgins, state:

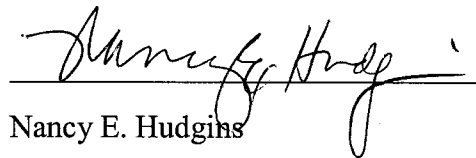
1. I am licensed to practice law before all of the courts of the State of California, as well as the United States District Court for the Northern District of California. I am the principal in the Law Offices of Nancy E. Hudgins.

2. Our law firm is working with The Law Offices of Patrick R. Kitchen as counsel to Plaintiffs Janis Keefe, Corinne Phipps and Renee Davis, individually and on behalf of all others similarly situated. I make this declaration in support of Plaintiffs' motion for class certification based on personal knowledge.
3. Thirty years ago I graduated from The University of Virginia Law School. Prior to that I graduated from Boston University in 1975. I was admitted to the California State Bar and the United States District Court for the Northern District of California in 1979. I have been actively practicing law in the State of California ever since, first as an associate at Hassard Bonnington, then as an associate and partner at Gordon & Rees. I have headed my own law firm for 20 years.
4. I have represented Fortune 500 and national companies in the oil and gas, rubber, chemical, nursing home, hospital and correctional healthcare industries. I have tried at least 26 jury trials to verdict, a handful of other jury trials and a handful of court trials.
5. In the early 1980's I worked on a class action involving well water owners in the Central Valley. More recently, I have worked on a couple of class actions involving health studios and clubs and this case involving Polo.
6. Since August 2006, our firm has provided legal research, counsel and support to plaintiffs' counsel in this case. In addition to me, Matthew M. Grigg and Mary M. Leichter have worked, and will continue to work on this case. I anticipate William B. Sturgeon will work with us on the trial of the case.
7. Matthew M. Grigg is a 1993 graduate of the University of Michigan and a 1997 graduate of Emory University School of Law. He has practiced law in California for approximately 10 years. He has worked on civil cases involving a wide variety of issues, including some involving employment law and class action issues, and has tried two cases. He has been admitted to practice in, and has represented numerous parties in, the United States District Court for the Northern District of California.

- 1 8. Mary M. Leichter is a 1988 graduate of the University of Michigan and a 1993
2 graduate of the University of Michigan School of Law. She has practiced law in
3 California for approximately 15 years. She has worked on class actions involving
4 wage-and-hour claims, employee misclassification claims and false advertising claims.
5 She has also worked on cases involving wrongful termination, labor law, bad faith,
6 constitutional law, race discrimination, and fraud. She has tried several cases to
7 verdict.
- 8 9. William B. Sturgeon graduated from San Jose State University in 1960 and Boalt Hall
9 School of Law in 1966. After serving as an Assistant District Attorney in San Francisco
10 for several years he joined Hassard Bonnington, where he became a partner and worked
11 for approximately 18 years. In 1986 he founded his own civil trial practice firm in San
12 Francisco, which he led as chief trial counsel for 14 years. Mr. Sturgeon became Of
13 Counsel to the Law Offices of Nancy E. Hudgins in 2000. He has tried approximately
14 100 cases to juries.
- 15 10. In sum, the four of us have tried over 130 jury trials to verdict. I personally tried a two-
16 week jury trial in this Courtroom in 1999 in a case called:
17 Cynthia Wignall v. Prison Health Services.
- 18 11. In this case, our firm has been involved in all aspects of discovery, prosecutorial
19 strategy including amending the complaint and preparing for class certification and
20 drafting the motion for class certification.
- 21 12. Plaintiffs Keefe, Phipps and Davis have cooperated with counsel to fulfill their
22 fiduciary duties to the class. They have had their depositions taken and have assisted
23 counsel in preparing responses to written discovery and in identifying factual issues
24 relevant to their claims.
- 25 13. Plaintiffs' litigation team also includes economists, licensed private investigators,
26 paralegals and experienced legal assistants who have devoted substantial time to this
27 case under counsels' direction. My firm and the Law Office of Patrick Kitchen have
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1 contributed considerable resources to the prosecution of this case, and are able and
2 willing to do so as long as is necessary to ensure the claims of class members are
3 properly and zealously prosecuted.

4 I declare under penalty of perjury under the laws of the United States of America and the
5 State of California that the foregoing is true and correct and that this declaration was made on June
6 6, 2007, at San Francisco, California.

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9 Nancy E. Hudgins